

November 15, 2002

Ms. Laurie Kral
Office of Air Quality Program
Region 10
United States Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Andy Ginsburg, Administrator
Air Quality Division
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, Oregon 97204

Mr. Russell Jim
Yakama Indian Nation
P.O. Box 151
Toppenish, Washington 98948

Mr. Gary Burke, Chairman
Confederated Tribes of the Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Dear Ms. Kral, Messrs. Ginsburg, Jim and Burke:

Re: Issuance of Significant Modification to the Hanford Site Title V Air Operating Permit (AOP)

The Washington State Department of Ecology (Ecology) formally issues the enclosed significant modification to the Hanford Site Title V AOP as Revision C. The terms and conditions of this revision become effective immediately.

USDOE's request for significant modification contains changes to the good combustion practice conditions that appear in AOP Attachment 1, Table 1.3, page 1-16. Enclosure 1 provides affected pages to be replaced or inserted into the AOP. Enclosure 2 is United States Department of Energy's (USDOE's) application document and supporting materials.

All Washington Administrative Code (WAC) 173-401-725 requirements were followed for review and subsequent issuance of this significant modification. The public participation and comment period started on October 10, 2002, for 30 days in accordance with WAC 173-401-800 to -820. There were no public comments received by Ecology during this period.

If you have questions regarding the issuance of this modification, please contact Oliver Wang, of my staff, at (509) 736-3040.

Sincerely,

Mike Wilson
Program Manager
Nuclear Waste Program

Oliver Wang
Professional Engineer
Nuclear Waste Program

MW:OW:nc

Enclosure 1: Replacement page of the AOP (Page 1-16 in Attachment 1 of the Hanford AOP)

Enclosure 2: USDOE Applications for Significant Modification to the Hanford Site Title V AOP (dated 8/12/02)

cc w/ attachments:

Mary Jarvis
Richland Operations Office
United States Department of Energy
P.O. Box 550, MS: A5-15
Richland, Washington 99352

Dennis Bowser
Office of River Protection
United States Department of Energy
P.O. Box 450, MS: H6-60
Richland, Washington 99352

Ms. Kral, Messrs. Ginsburg, Jim and Burke
October 31, 2002
Page 3

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Richland, Washington 99352

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Bechtel National
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Richland, Washington 99352

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Bechtel Hanford, Inc.
3350 George Washington Way
Richland, Washington 99352

Chris Kemp
CH2M Hill Hanford Group
P.O. Box 1500, MS: R1-51
Richland, Washington 99352-1505

Brad Atencio
Pacific Northwest National Laboratory
P.O. Box 999, MS: P7-68
Richland, Washington 99352

Craig Lawrence
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504-7827

Administrative Record: Hanford AOP

cc w/o attachments:

Douglas Hardesty
Office of Air Quality Program
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Joel Hebdon, Director
Regulatory Compliance and Analysis Division
Richland Operations Office
United States Department of Energy
P.O. Box 550, MS: A5-15
Richland, Washington 99352

Al Conklin
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504-7827

Ken Niles
Oregon Office of Energy
625 Marion Street NE
Salem, Oregon 97301

bcc w/attachments: Oliver Wang, Ecology (2)
NWP Central File: AOP

bcc w/o attachments: Jerry Hensley, Ecology
Steve Lijek, Ecology
Tom Todd, Ecology Air Quality Program
Ron Skinnarland, Ecology
Mary Anne Wuennecke, Ecology
Reader File

Enclosure 1: Replacement page of the AOP (Page 1-16 in Attachment 1 of the Hanford AOP)

General Conditions:					
<ul style="list-style-type: none">Operation and Maintenance Manuals will be obtained from the manufacturer(s) and made available for review by Ecology on request."Good combustion practices" will be applied to all boilers. Good combustion practices include but are not limited to the following:					
Daily	Monthly	Semi-annually	Annually	Every two years	
Visually check combustion	Inspect burner	Visually inspect air supply system, and clean and repair if necessary.	Conduct boiler tuneups on large boilers (>5 mmBTU/hr heat input) by manufacturer trained technicians or other qualified personnel. See 2.5 for recordkeeping.	Conduct boiler tuneups on smaller boilers (<5 mmBTU/hr heat input) by manufacturer trained technicians or other qualified personnel. See 2.5 for recordkeeping.	
Record available operating data	Inspect boiler exteriors				
	Check combustion controls		Clean and check fuel supply system (Visually inspect and replace filters if necessary).		
	Check for leaks		Clean fireside surfaces and breaching for Power Boilers.	Clean fireside surfaces and breaching for Low Pressure Boilers.	
	Check for unusual noise, vibrations, etc.		Inspect refractory for Power Boilers.	Inspect refractory for Low Pressure Boilers.	

¹ The Test Methods identified in this table are used as compliance verification tools. A frequency is not applicable unless specified in the table.

Enclosure 2: USDOE Applications for Significant Modification to the Hanford Site Title V AOP (dated 8/12/02)

ENVIRONMENTAL PORTAL DISTRIBUTION COVERSHEET

REGULATORY INFORMATION

Page 1 of 2

Author
J. B. Hebdon/RL

Addressee
A. W. Conklin/WDOH
O. S. Wang/DOEC

Correspondence No.
0203790
DOE-RL: 02-RCA-0505
CC Recd: 08/14/2002
Ref: FH-0203400

Subject: **REQUEST FOR SIGNIFICANT MODIFICATION TO THE HANFORD SITE TITLE V AIR
OPERATING PERMIT (AOP) (NUMBER 00-05-006)**

DISTRIBUTION

Approval	Date	Name	Location	w/att
		Environmental Portal	A3-01	X
		<u>Fluor Hanford</u>		
		J. A. Bates	N1-25	X
		L. E. Borneman	T6-16	X
		R. C. Bowman	A1-14	X
		N. C. Boyter	L5-66	X
		R. C. Brunke	N1-26	X
		S. B. Cherry	B3-15	X
		S. B. Clifford	N1-25	X
		K. F. Clouse	N1-25	X
		L. M. Culley	B3-70	X
		N. R. Dahl	N2-57	X
		T. T. Daniels	B3-70	X
		W. E. Davis	N1-26	X
		L. P. Diediker	N1-24	X
		B. J. Dixon	R3-32	X
		R. H. Engelmann	N1-25	X
		W. E. Green	N1-25	X
		R. H. Gurske	H8-73	X
		K. A. Hadley	T5-57	X
		J. W. Hales	A1-14	X
		J. S. Hertzal	A1-14	X
		J. E. Hyatt	N1-24	X
		C. A. Kooiker	N2-57	X
		T. W. Noland	H8-67	X
		J. K. Perry	L1-04	X
		K. A. Peterson	N1-26	X
		S. M. Price	H8-67	X
		D. G. Ranade	N1-26	X
		D. J. Rokkan	N1-24	X
		S. L. Stolle	H8-67	X
		J. A. Van Vliet	H6-10	X
		D. J. Watson	X3-79	X
		L. F. Willis	H8-73	X

ENVIRONMENTAL PORTAL

For Questions or Distribution/MSIN Corrections

OUTLOOK ADDRESS: ^CORRESPONDENCE CONTROL-PHMC

Contact: 376-8111 or 372-3931

ENVIRONMENTAL PORTAL DISTRIBUTION COVERSHEET

REGULATORY INFORMATION

Page 2 of 2

Author

J. B. Hebdon/RL

Addressee

A. W. Conklin/WDOH

O. S. Wang/DOEC

Correspondence No.

0203790

DOE-RL: 02-RCA-0505

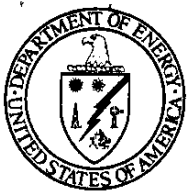
CC Recd: 08/14/2002

Ref: FH-0203400

Subject: **REQUEST FOR SIGNIFICANT MODIFICATION TO THE HANFORD SITE TITLE V AIR
OPERATING PERMIT (AOP) (NUMBER 00-05-006)**

DISTRIBUTION

Approval	Date	Name	Location	w/att
		<u>U. S. Department of Energy, Richland Operations Office</u>		
		J. J. Bevelacqua	H6-60	X
		J. B. Hall	A2-15	X
		H. M. Rodriguez	A5-15	X
		S. D. Stubblebine	H6-60	X
		B. D. Williamson	A4-52	X



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0203790
CC Recd: 08/14/2002

02-RCA-0505

AUG 12 2002

Mr. A. W. Conklin, Manager
Air Emissions and Defense Waste Section
Division of Radiation Protection
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504

Mr. O. S. Wang
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Addressees:

**REQUEST FOR SIGNIFICANT MODIFICATION TO THE HANFORD SITE TITLE V AIR
OPERATING PERMIT (AOP) (NUMBER 00-05-006)**

Enclosed is a request for a Significant Modification to the Hanford Site Title V AOP pursuant to Washington Administrative Code (WAC) 173-401-725(4).

The Significant Modification (Enclosure 1) request package contains changes to the good combustion practice conditions that appear in AOP Attachment 1, Table 1.3, page 1-16. These changes are as follows:

- a re-alignment of the refractory inspection requirement with the applicable requirements contained in WAC 296-104-100 and the Revised Code of Washington (RCW) 70.79.240;
- clarification of the requirement to "Clean and check air supply system";
- clarification of the condition to "Clean and check fuel supply system"; and
- further distinguish good combustion practice conditions to reflect the difference between Power Boilers and Low Pressure Boilers.

Also included in the Significant Modification (Enclosure 2) is a form titled "Notification of Permit Modification Request to the U.S. Environmental Protection Agency, Region 10, the Tribes, and Affected States."

Addressees
02-RCA-0505

-2-

AUG 12 2002

The AOP modification process for Significant Modifications is contained in WAC 173-401-725(4). According to this process, the State of Washington Department of Ecology, will be responsible for the following:

- provide the U.S. Environmental Protection Agency (EPA) a copy of the permit application;
- maintain and update the permit register;
- prepare and publish public notices and/or public hearings;
- conduct 30 day public and affected states review period;
- respond to any public and affected state's comments, prepare responsiveness summary, and revise application accordingly;
- provide to EPA for 45 day review;
- issue within 15 days after EPA review/approval, or deny the change;
- update and publish modified AOP as required; and
- complete review on the majority of significant AOP modifications within 9 months after receipt of a complete application.

If you have any questions, please contact Dale Jackson, of my staff, on (509) 376-4851.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:DEJ

Enclosures

cc w/encls:

R. H. Engelmann, FHI
R. Gay, CTUIR
W. E. Green, FHI
R. H. Gurske, FHI
R. Jim, YN

C. M. Lawrence, WDOH
D. Sobotta, NPT
C. O. Tallent, JCI
P. A. Weiher, JCI
Environmental Portal, A3-01

Enclosure 1

**Hanford Site Title V Air Operating Permit
Request for Significant Modification to the AOP**

Consisting of 5 pages, including coversheet

HANFORD SITE AIR OPERATING PERMIT

Significant Permit Modification Request

Permit Number 00-05-006

Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do not meet the requirements for a minor permit modification or an administrative amendment.

Provide the following information pursuant to WAC-173-401-725(4)

Emission point identification and description of the change:

See attachment 1, Revised AOP Attachment 1, page 1-16.

Describe the emissions resulting from the change:

There are no new emissions resulting from the changes described in this significant permit modification request.

Describe the new applicable requirements that will apply as a result of the change:

New applicable requirements include:

- Annual refractory inspection for Power Boilers,
- Refractory inspection for Low Pressure Boilers every two years,
- Annually clean fireside surfaces and breaching for Power Boilers,
- Clean fireside surfaces and breaching for Low Pressure Boilers every two years.

Also, the requirement to semi-annually "Clean and check air supply system" was edited to read semi-annually "Visually inspect air supply system, and clean and repair if necessary." The requirement to semi-annually "Clean and check fuel supply system" was edited to read semi-annually "Clean and check fuel supply system (visually inspect and replace filters if necessary)."

Suggested Draft Permit Language:

for example:

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory, process limits such as throughput, hours of operation, or acceptance criteria, or other assumptions used in Potential to Emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

See attachment 1, Revised AOP Attachment 1, page 1-16, for suggested language.

Attachment 1:
Revised AOP Attachment 1, page 1-16

General Conditions:

- Operation and Maintenance Manuals will be obtained from the manufacturer(s) and made available for review by Ecology on request.
- "Good combustion practices" will be applied to all boilers. Good combustion practices include but are not limited to the following:

Daily	Monthly	Semi-annually	Annually	Every two years
Visually check combustion	Inspect burner	Visually inspect air supply system, and clean and repair if necessary.	Conduct boiler tuneups on large boilers (>5 mmBTU/hr heat input) by manufacturer trained technicians or other qualified personnel. See 2.5 for recordkeeping.	Conduct boiler tuneups on smaller boilers (<5 mmBTU/hr heat input) by manufacturer trained technicians or other qualified personnel. See 2.5 for recordkeeping.
Record available operating data	Inspect boiler exteriors	Clean and check fuel supply system (visually inspect and replace filters if necessary.)	Clean fireside surfaces and breaching for Power Boilers.	Inspect refractory for Low Pressure Boilers.
	Check combustion controls		Inspect refractory for Power Boilers.	Clean fireside surfaces and breaching for Low Pressure Boilers.
	Check for leaks Check for unusual noise, vibrations, etc.			

¹ The Test Methods identified in this table are used as compliance verification tools. A frequency is not applicable unless specified in the table.

**NOTIFICATION OF PERMIT MODIFICATION REQUEST TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY,
REGION 10, THE TRIBES, AND AFFECTED STATES**

Attached is a request to revise the Hanford Site Air Operating Permit. This form serves as notification to EPA, tribes, and affected states of a request for an Air Operating Permit Modification per WAC 173-401-725(2), (3) and (4).

Air Operating Permit Number: 00-05-006	
Source: U.S. Department of Energy, Richland Operations, Hanford Site	
Mailing Address: P.O. Box 550 Richland, WA 99352	Physical Address: 825 Jadwin Ave. Richland, WA 99352
Brief Description: <p>The purpose of this significant modification to the Hanford Site Air Operating Permit is to realign the good combustion practice condition to semiannually inspect refractory with the requirements in WAC 296-104-100 and RCW 70.79.240. A further purpose is to better define two other good combustion practice conditions and further edit the good combustion practices conditions to reflect differences between Power Boilers and Low Pressure Boilers.</p>	
Contact Name: Joel B. Hebdon	Phone: 509-372-2400
Title: Director, Regulatory Compliance and Analysis Division US Department of Energy, Richland Operations Office	
FOR ECOLOGY USE ONLY	
Application Number	Date Received
Ecology Contact	
Date of Publication in Permit Register	Public Comment Period Ends